

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION AT CLEVELAND

CHARLES BOHON

Plaintiff,

v.

CITIMORTGAGE, INC., *et al.*

Defendants.

Case No. 1:17-cv-00533

Judge Christopher A. Boyko

**PLAINTIFF CHARLES BOHON'S
MEMORANDUM IN OPPOSITION TO
DEFENDANTS' NOTICE OF
SETTLEMENT AND REQUEST FOR
STAY**

Plaintiff Charles Bohon ("Plaintiff"), through Counsel, respectfully requests this Court deny *Defendants CitiMortgage, Inc. and Reimer Law Firm's Notice of Settlement and Request for Stay* ("CitiMortgage", "Reimer" and collectively "Defendants"), Doc. No. 13, filed on May 16th, 2017 for the reasons set forth in the Memorandum in Support.

WHEREFORE Plaintiff Charles Bohon respectfully requests this Court deny Defendants CitiMortgage, Inc. and Reimer Law Firm's Request for Stay and for all other relief this Court may deem just and proper.

Respectfully submitted,

/s/ Brian D. Flick, Esq.

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MEMORANDUM IN SUPPORT

This matter is before the Court on Plaintiff Charles Bohon's Memorandum in Opposition to Defendants CitiMortgage, Inc. and Reimer Law Firm's Notice of Settlement and Request for Stay filed with this Court on May 16th, 2017 (Doc. No. 13). In the Defendants' Notice the Defendants notify this Court that the parties have “reached a settlement in principal, which will resolve this case as well as other pending litigation pending in the Cuyahoga County Court of Common Pleas pending between Plaintiff and CitiMortgage.”

The Plaintiff and the Defendants have been engaged in good faith settlement negotiations however as of May 16th, 2017 Defendant CitiMortgage sent over a settlement agreement that contained two provisions that the Plaintiff and Plaintiff's Counsel had not bargained for. The Plaintiff does not oppose the Defendants' request in their Notice to stay any pending deadlines for either Defendant to file an answer for a period of 30-45 days.

The Plaintiff would respectfully request this Court not dismiss these proceedings until a subsequent joint notice of settlement and joint notice of dismissal with reservation of jurisdiction is filed with the Court.

WHEREFORE Plaintiff Charles Bohon respectfully requests this Court deny Defendants CitiMortgage, Inc. and Reimer Law Firm's Request for Stay and for all other relief this Court may deem just and proper.

Respectfully submitted,

/s/ Brian D. Flick, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of May, 2017 a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Brian D. Flick, Esq.
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